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## **U.S. Department of Justice**

United States Attorney Eastern District of Missouri

Violent Crime Unit

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July 15, 2019

## **VIA ELECTRONIC SERVICE**

Mr. Robert Taaffe, Jr. 1015 Locust, Suite 725 St. Louis, Missouri 63101

In re: Stipulations

United States v. Steve Williams Cause No. S1- 4:18 CR 697 HEA

Dear Mr. Taaffe:

Count One of the indictment charges Mr. Williams with being a felon in possession of a firearm on July 23, 2018, in violation of 18 U.S.C. § 922(g)(1).

In anticipation of the upcoming July 22, 2019, trial and in an effort to conserve time and resources, enclosed please find a proposed stipulation of facts to which your client and the United States of America may agree. The enclosed stipulation specifically addresses your client's status as a previously convicted felon. It also addresses the concerns expressed by the United States Supreme Court in Old Chief v. United States, 519 U.S. 172 (1997) and Rehaif v. United, \_\_\_\_ U.S. \_\_\_\_ (June 21, 2019).

I would appreciate a response to the enclosed stipulation by no later than the close of business on Wednesday, July 17, 2019.

Very truly yours,

JEFFREY B. JENSEN United States Attorney

s/ Linda Lane

BY: LINDA LANE

**Assistant United States Attorney** 

Enclosure

Cc: Clerk, Untied States District Court (w/o encls.)